

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

KANG LU,

Plaintiff,

v.

EXECUTIVE OFFICE OF PUBLIC SAFETY  
AND SECURITY (EOPSS); TERENCE REIDY,  
in his official capacity as Secretary of EOPSS;  
OFFICE OF THE ATTORNEY GENERAL; and  
ANDREA JOY CAMPBELL, in her official  
capacity as Attorney General of Massachusetts,

Defendants.

CIVIL ACTION  
NO. 1:23-cv-12045-AK

**DEFENDANTS' MOTION FOR PROTECTIVE ORDER AND/OR TO STAY  
DISCOVERY PENDING RESOLUTION OF FORTHCOMING MOTION TO DISMISS**

Defendants – Executive Office of Public Safety and Security (EOPSS), Terrance Reidy, in his official capacity as Secretary of EOPSS (“Secretary Reidy”), the Office of the Attorney General (“AGO”), and Andrea Joy Campbell, in her official capacity as Attorney General of Massachusetts (“Attorney General”) – hereby move for a protective order under Fed. R. Civ. P. 26(c) and/or for a stay of discovery until the Court rules on the Defendants’ forthcoming motion to dismiss the Plaintiff’s Complaint. In support of this motion, Defendants refer the Court to, and incorporate by reference, the accompanying memorandum of law, submitted herewith.

WHEREFORE, Defendants respectfully request that the Court enter a protective order and/or stay discovery pending resolution of Defendants’ forthcoming motion to dismiss.

Respectfully submitted,

EXECUTIVE OFFICE OF PUBLIC SAFETY  
AND SECURITY (EOPSS), and TERENCE  
REIDY, in his official capacity as Secretary of  
EOPSS; OFFICE OF THE ATTORNEY  
GENERAL, and ANDREA JOY CAMPBELL, in  
her official capacity as Attorney General of  
Massachusetts,

By their attorney,

ANDREA JOY CAMPBELL  
ATTORNEY GENERAL

*/s/ Angélica L. Durón*  
Angélica L. Durón, BBO# 705315  
Assistant Attorney General  
Government Bureau  
Office of the Attorney General  
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Dated: September 25, 2023

**CERTIFICATE PURSUANT TO LOCAL RULE 7.1(a)(2)**

I, Angélica L. Durón, Assistant Attorney General, hereby certify that on September 22, 2023, I conferred with Plaintiff, Kang Lu. Despite a good faith effort, the parties were not able to resolve the issue set forth in the motion.

*/s/ Angélica L. Durón*  
Angélica L. Durón  
Assistant Attorney General

**CERTIFICATE OF SERVICE**

I hereby certify that this document filed electronical through the CM/ECF system will be sent electronically to registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent by first class mail to those indicated as non-registered participants on September 25, 2023:

Kang Lu  
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Brookline, MA 02446  
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*/s/ Angélica L. Durón*  
Angélica L. Durón, BBO# 705315  
Assistant Attorney General